

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re: North Sea Brent Crude Oil Futures Litigation

13-md-02475 (ALC) (SN)

**DECLARATION OF RAYMOND GIRNYS IN FURTHER SUPPORT OF THE MOTION
FOR THE APPOINTMENT OF LOWEY DANNENBERG COHEN & HART, P.C.,
LOVELL STEWART HALEBIAN JACOBSON LLP, AND ROBINS, KAPLAN, MILLER
& CIRESI L.L.P. AS INTERIM CLASS COUNSEL**

I, Raymond Girnys, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an associate at the law firm of Lowey Dannenberg Cohen & Hart, P.C., and submit this Declaration in Further Support of the Motion to Appoint Lowey Dannenberg Cohen & Hart, P.C., Lovell Stewart Halebian Jacobson LLP as Chairman, and Robins, Kaplan, Miller & Ciresi L.L.P. as Interim Class Counsel.

2. I reviewed the allegations of the complaint in the action-styled *McDonnell, et al. v. Royal Dutch Shell PLC, et al.*, Case No. 13-cv-07089 (S.D.N.Y.) ("*McDonnell*").

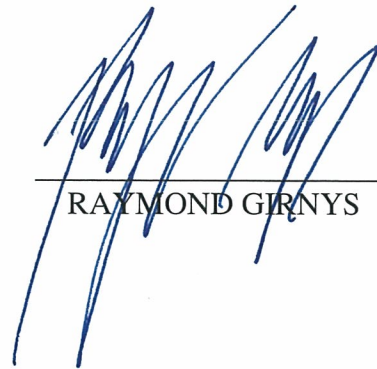
3. The *McDonnell* allegations in the chart attached hereto as Exhibit A were quoted verbatim or virtually verbatim from various Platts Crude Oil Marketwire reports published in February 2011 and September 2012, respectively.

4. As set forth in Exhibit A hereto, the breakdown by heading of the *McDonnell* allegations is as follows:

- a. 36% of the *McDonnell* allegations under the heading “The February 2011 Manipulation” are copied verbatim or virtually verbatim from various Platts Crude Oil Marketwire reports published in February 2011;
 - b. 45% of the *McDonnell* allegations under the heading “Early Month Suppression” regarding the September 2012 manipulation are copied verbatim or virtually verbatim from various Platts Crude Oil Marketwire reports published in September 2012;
 - c. 57% of the *McDonnell* allegations under the heading “Mid-month Inflation” regarding the September 2012 manipulation are copied verbatim or virtually verbatim from various Platts Crude Oil Marketwire reports published in September 2012; and
 - d. 64% of the *McDonnell* allegations under the heading “Late Month Suppression” regarding the September 2012 manipulation are copied verbatim or virtually verbatim from various Platts Crude Oil Marketwire reports published in September 2012.
5. I have also reviewed the allegations of the complaint in the action-styled *White Oak Fund LP v. BP PLC, et. al.*, Case No. 13-cv-04553 (S.D.N.Y.) (“*White Oak*”). Attached hereto as Exhibit B is a chart comparing the allegations in the *White Oak* action, the allegations in the *McDonnell* action and the allegations of the first filed-action, *Prime International Trading, Ltd. v. BP PLC, et al.*, Case No. 13-cv-03473 (S.D.N.Y.) (“*Prime International*”). The bolded allegations in Exhibit B hereto were quoted verbatim or virtually verbatim from the complaint in *Prime International*.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 26, 2013
White Plains, New York



RAYMOND GERNYS